

1 ROSEMARIE T. RING (SBN 220769)
rose.ring@mto.com

2 MUNGER, TOLLES & OLSON LLP
3 560 Mission Street
Twenty-Seventh Floor
San Francisco, California 94105-2907
4 Telephone: (415) 512-4000
Facsimile: (415) 512-4077

5 CHRISTINE P. SUN (SBN 218701)
csun@aclunc.org

6 ELIZABETH O. GILL (SBN 218311)
egill@aclunc.org

7 AMERICAN CIVIL LIBERTIES UNION
8 FOUNDATION OF NORTHERN
CALIFORNIA, INC.

9 39 Drumm Street
San Francisco, CA 94111
10 Telephone: (415) 621-2493
Facsimile: (415) 255-8437

11 Attorneys for Plaintiff

12
13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION
16

17 SERVICE WOMEN'S ACTION
NETWORK,

18 Plaintiff,

19 vs.

20 JAMES N. MATTIS, Secretary of Defense,
21 Defendant.
22

CHAD A. READLER

Acting Assistant Attorney General

ANTHONY J. COPPOLINO

Deputy Branch Director

ANDREW E. CARMICHAEL

andrew.e.carmichael@usdoj.gov

Virginia Bar No. 76578

Trial Attorney

Civil Division, Federal Programs Branch

U.S. Department of Justice

20 Massachusetts Avenue, N.W., Rm. 7218

Washington, D.C. 20044

Telephone: (202) 514-3346

Facsimile: (202) 305-2685

Attorneys for Defendant JAMES N. MATTIS

Case No. 12-CV-06005 EMC

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING DEADLINE FOR
FILING OF THIRD AMENDED
COMPLAINT**

Judge: Hon. Edward M. Chen

1 On May 1, 2018, the Court granted Defendant's motion to dismiss Plaintiff's
2 Second Amended Complaint, on standing grounds. Dkt. 110. The Court gave leave to Plaintiff to
3 file an amended complaint within four weeks of the date of the order. *Id.* at 23.

4 Plaintiff Service Women's Action Network ("SWAN") has requested that
5 Defendant James N. Mattis stipulate that the May 29, 2018 filing deadline for the filing of an
6 amended complaint be extended by thirty days, to June 28, 2018, on the ground that Plaintiff's
7 counsel, Mr. Perry, has been tied up with several new matters and is scheduled to be on vacation
8 next week. Defendant's counsel has agreed to the requested extension.

9 In light of the foregoing, the parties hereby stipulate that Plaintiff may have leave
10 to file its amended complaint on or before June 28, 2018.

11
12 DATED: May 11, 2018

MUNGER, TOLLES & OLSON LLP

13
14 By: /s/ Steven M. Perry

STEVEN M. PERRY

15
16 Attorneys for Plaintiff
SERVICE WOMEN'S ACTION NETWORK

17
18 DATED: May 11, 2018

CHAD A. READLER
Acting Assistant Attorney General
ANTHONY J. COPPOLINO
Deputy Branch Director
ANDREW E. CARMICHAEL

19
20
21
22 By: /s/ Andrew E. Carmichael

ANDREW E. CARMICHAEL

23 U.S. Department of Justice
24 Attorneys for Defendant JAMES N. MATTIS
25
26
27
28

1 Additional Counsel:

2 STEVEN M. PERRY (SBN 106154)
3 MUNGER, TOLLES & OLSON LLP
4 350 South Grand Avenue, 50th Floor
5 Los Angeles, CA 90071
6 Telephone: (213) 683-9100
7 Facsimile: (213) 687-3702
8 Email: *steven.perry@mtol.com*

LENORA M. LAPIDUS [pro hac vice]
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
WOMEN'S RIGHTS PROJECT
125 Broad Street, 18th Floor
New York, NY 10004
Telephone: (212) 549-2668
Facsimile: (212) 549-2480
Email: *Llapidus@aclu.org*

8 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

9 I, Steven M. Perry, am the ECF User whose identification and password are being used to
10 file this Stipulation and [Proposed] Order. In compliance with General Order 45.X.B, I hereby
11 attest that all signatories have concurred in this filing.

12
13 /s/ Steven M. Perry

14
15
16 **[PROPOSED] ORDER**

17
18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19
20
21 DATED: May 16, 2018

22
23
24
25 38626519.1

